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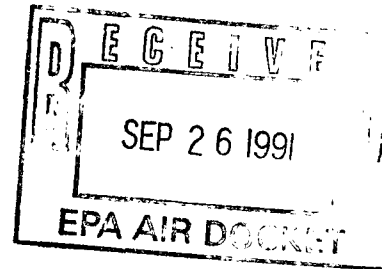


A-91-46
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September 20, 1991



Environmental Protection Agency
Public Docket A-91-46
Air Docket (LE-131)
401 M. Street, S.W., Room M-1500
Washington, D.C. 20460

RE: Application for Fuel Additive Waiver Filed By Ethyl Corporation For Hi-Tec 3000 Performance Additive

Gentlemen:

Once again, Giant Industries Arizona, Inc. ("Giant") has learned that the Ethyl Corporation of Richmond, Virginia ("Ethyl") has requested positive action from the Environmental Protection Agency ("EPA") relative to a waiver application for its automobile fuel additive, Hi-Tec 3000 Performance Additive ("Hi-Tec"). It remains Giant's understanding that the use of Hi-Tec in automobiles acts as an octane enhancer, as well as a benefit to the environment by reducing vehicle emissions. Therefore, Giant urges the EPA to give full consideration to Ethyl's waiver.

Giant is, among other things, a regional refiner and marketer of petroleum products. Its corporate headquarters are located at 23733 North Scottsdale Road, Scottsdale, Arizona, 85255. The Company's refinery is located near Gallup, New Mexico (the "Ciniza Refinery"). The refinery has a Department of Energy rated crude capacity of 18,000 barrels per day.

In conclusion, as a regional refiner-marketer, Giant remains very interested in having the product become available as it would provide us additional octane generating flexibility as will help us in meeting requirements outlined in the Clean Air Act Amendments of 1990.

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Thank you for your consideration of our interest in Ethyl's Hi-Tec,
and we are hopeful that you will grant the waiver request.

Sincerely,



Carl D. Shook
Vice President
Refinery Operations

cc: Mary T. Smith
Director Field Operations and Support Division (EN-397F)
U.S. Environmental Protection Agency
401 M. Street S.W.
Washington, D.C. 20460